



Pillsbury Winthrop Shaw Pittman LLP
31 West 52nd Street | New York, NY 10019-6131 | tel 212.858.1000 | fax 212.858.1500

Jeffrey P. Metzler
tel: +1.212.858.1153
jeffrey.metzler@pillsburylaw.com

June 28, 2022

VIA ECF

Honorable Gregory H. Woods
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, Room 2260
New York, NY 10007

Re: *John Doe v. New York University*; No. 20-cv-01343 (GHW)
Letter Requesting Leave to Refile Corrected Exhibits

Dear Judge Woods:

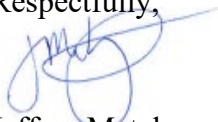
I write on behalf of Defendant New York University (“Defendant” or “NYU”) in the above-captioned matter (the “Action”) pursuant to Rule 4(A)(ii) of Your Honor’s Individual Rules of Practice and in connection with NYU’s Motion for Summary Judgment (ECF Nos. 85-88) (the “Motion”) and NYU’s Motion to Seal (ECF No. 90). Plaintiff has alerted NYU that three pages across the 84 exhibits (the “Exhibits”) filed in connection with the Motion contain four names that require redaction. In addition, Plaintiff has requested that NYU redact not only the last names but also the first names of Plaintiff’s parents in each of the Exhibits where applicable. While NYU does not agree that the first names of Plaintiff’s parents constitute personally identifiable information within the meaning of the applicable orders entered in this case, it has nevertheless agreed to Plaintiff’s request.

For that reason, NYU respectfully requests the Court to direct the Clerk of Court to seal ECF Nos. 88, 88-19, 88-21, 88-24, 88-51, 88-53, 88-66, 88-73, and 88-82. NYU is separately filing corrected versions of those documents contemporaneously, attaching Exhibits 12, 14, 17, 44, 46, 59, 66, and 75 to the Motion, respectively, to a version of

Honorable Gregory H. Woods
June 28, 2022
Page 2

the Declaration of Jeffrey P. Metzler in Support of NYU's Motion for Summary Judgment containing one redaction.

Respectfully,



Jeffrey Metzler
Counsel for Defendant

cc: Kimberly C. Lau and James Figliozi (via CM/ECF)